

# Exhibit 6

RE: Julian Assange deposition

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From: Prather, Laura (laura.prather@haynesboone.com)

To: tyclevenger@yahoo.com

Cc: bodneyd@ballardspahr.com; Wesley.Lewis@haynesboone.com; stevenbiss@earthlink.net

Date: Thursday, February 13, 2020, 11:27 AM CST

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Ty:

We cannot agree to you amending your complaint (after two prior amendments, well beyond the deadline in the Amended Scheduling Order). Only the Court could grant such relief at this late date.

Likewise, we know of no reason that would justify more time than the 21 days provided by Rule 11 for you to withdraw your contentions or appropriately correct them. If you wish to discuss the matter, however, please call.

Laura

**Laura Lee Prather**, Appellate Law Board Certified

Partner

(t) +1 512.867.8476

Licensed in Texas, California, New York, and D.C.

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**From:** Ty Clevenger <tyclevenger@yahoo.com>

**Sent:** Wednesday, February 12, 2020 10:57 AM

**To:** Prather, Laura <Laura.Prather@haynesboone.com>

**Cc:** David J. Bodney <bodneyd@ballardspahr.com>; Lewis, Wesley <Wesley.Lewis@haynesboone.com>; Steven S. Biss <stevenbiss@earthlink.net>

**Subject:** Re: Julian Assange deposition

**EXTERNAL:** Sent from outside haynesboone

Also, please let me know whether you would oppose our motion to amend the complaint. We would only address issues that you raised in your motion, i.e., we would not be adding anything new.

On Wednesday, February 12, 2020, 10:15:31 AM EST, Ty Clevenger <[tyclevenger@yahoo.com](mailto:tyclevenger@yahoo.com)> wrote:

Laura,

I write to request a one-week extension of time to respond to your draft Rule 11. We have concluded that some portions of the complaint need to be corrected, but Mr. Butowsky has been in the hospital since Monday and I will not be back in Texas until Friday or Saturday. Thank you for your consideration.

Ty

On Tuesday, February 11, 2020, 07:33:40 PM EST, Ty Clevenger <[tyclevenger@yahoo.com](mailto:tyclevenger@yahoo.com)> wrote:

So electronic copies are a no?

[Sent from Yahoo Mail on Android](#)

On Tue, Feb 11, 2020 at 4:26 PM, Ty Clevenger

<[tyclevenger@yahoo.com](mailto:tyclevenger@yahoo.com)> wrote:

Thank you, Laura. I'll get a copy of the final application / declaration from Eden. Would you mind sending electronic copies of the Rule 11 exhibits? I'm leaving soon, and wondering if I need to pack the extra pounds. Thanks.

Ty

On Tuesday, February 11, 2020, 04:06:09 PM EST, Prather, Laura <[laura.prather@haynesboone.com](mailto:laura.prather@haynesboone.com)> wrote:

Hi Ty,

My apologies for not getting back with you earlier. I was out the latter part of last week and am just now able to start catching up on emails.

In reviewing the materials you sent, it references a Declaration of Eden P. Quinton but there is none attached. Can you please send that (or any other attachments you anticipate filing with the Request) so we can review?

Once we've had a chance to review that, I will get back to you quickly.

Thanks and take care,

Laura

**Laura Lee Prather**, Appellate Law Board Certified  
Partner  
(t) +1 512.867.8476

Licensed in Texas, California, New York, and D.C.

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**From:** Ty Clevenger <[tyclevenger@yahoo.com](mailto:tyclevenger@yahoo.com)>  
**Sent:** Thursday, February 6, 2020 3:38 PM  
**To:** Prather, Laura <[Laura.Prather@haynesboone.com](mailto:Laura.Prather@haynesboone.com)>  
**Cc:** David J. Bodney <[bodneyd@ballardspahr.com](mailto:bodneyd@ballardspahr.com)>; Lewis, Wesley <[Wesley.Lewis@haynesboone.com](mailto:Wesley.Lewis@haynesboone.com)>; Steven S. Biss <[stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)>  
**Subject:** Fw: Julian Assange deposition

<b>EXTERNAL:</b> Sent from outside haynesboone
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Laura,

Please let me know whether your clients would oppose a similar request in the Folkenflik case. Thanks.

Ty

----- Forwarded Message -----

**From:** Ty Clevenger <[tyclevenger@yahoo.com](mailto:tyclevenger@yahoo.com)>  
**To:** Fuller, Marc <[mfuller@velaw.com](mailto:mfuller@velaw.com)>; Joiner, Jamison <[jjoiner@jw.com](mailto:jjoiner@jw.com)>

**Cc:** Leatherbury, Tom <[tleatherbury@velaw.com](mailto:tleatherbury@velaw.com)>; Coker, Megan <[megancoker@velaw.com](mailto:megancoker@velaw.com)>; Kerns, Devin <[dkerns@velaw.com](mailto:dkerns@velaw.com)>; Latham, Bob <[blatham@jw.com](mailto:blatham@jw.com)>; Steve Udick <[SUdick@skiermontderby.com](mailto:SUdick@skiermontderby.com)>; Paul Skiermont <[pskiermont@skiermontderby.com](mailto:pskiermont@skiermontderby.com)>

**Sent:** Tuesday, January 7, 2020, 08:36:30 AM EST

**Subject:** Julian Assange deposition

All,

I intend to ask the Court to request, pursuant to the Hague Convention, the deposition of Julian Assange. I've attached a letter drafted by Eden Quaintan, Mr. Butowsky's counsel in DC, and I intend to follow the same outline. Please let me know whether you clients intend to oppose the motion. Thanks.

Ty

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